



General Recommendations for Audit Preparation

The following suggestions are provided for organizations that are preparing for their BSOAP accreditation:

1. Always provide sufficient background information in response to each clause to allow the auditor to fully understand your policy, procedures and operations related to each clause. There is no set amount of information needed, but responses of several paragraphs may not include enough information to adequately measure conformity with a standard. Also, you may want to provide more than one source of conformity evidence if you have multiple forms of verification, but only one form of evidence is required to demonstrate conformity. For example, you may provide a policy, a tracker, training materials or work instruction documentation for one clause.
2. Always have a staff member not involved in preparing the materials go through the entire audit submission to make sure that all attachments are included and properly labelled and correspond to the clause. Since all submissions are electronic, it is important to note that a given document may need to be uploaded for multiple clauses, if applicable.
3. If you are referring to a policy document that is more than 1 or 2 pages long, always highlight the key language, or refer to a page/paragraph so the auditor is not hunting for the intended citation in a lengthy document.
4. Please provide a current organization chart listing all the key CRA positions. This documentation will help your auditor plan the site visit. This can be included in additional attachments in Smartsheet.
5. Your auditor is not from Missouri, but their state motto “Show Me” applies to the accreditation process. If something is not in writing, it does not exist in terms of demonstrating conformity with the standards.... Be sure that the evidence provided “shows” the auditor how your organization complies with each clause.



Recommendations for Specific Clauses

The following suggestions are related to specific clauses where we have seen different interpretations and non-conformities. All information can be found in the Attributes of and Suggestions for Onsite Audit column of each Standard.

1.6 Access Protocol

Organizations should be able to demonstrate the access protocols in place, specifically to protect access to consumer information. **Records of such access** must also be readily available for all former and current organization workers.

1.7 Electronic Access Control

Like 1.6, the organization should be able to demonstrate the access protocols in place, specifically to protect access to consumer information. **Records of such access must also be readily available for all former and current organization workers.** These permissions **should be role-based and show how to add, remove, or change user access.** A helpful requirement is for a written log, or checklist, to be maintained to track access.

2.6 Integrity

This clause has been interpreted to require specific references to “**fraud and bribery**” in policy documents for organization workers. Many applicants have lengthy codes of conduct covering various forms of misconduct but neglect to mention the words fraud and bribery. This **specific language** is required in the documentation for organization workers on integrity issues.

2.8 Agreement from Client

Make sure that all your **client agreements contain the required language.** In the US Standard, this will refer to all the Fair Credit Reporting Act (FCRA) language that is stipulated in the clause. Your audit will include a review of this information for a random sample of clients. This requirement is for all client contracts. Clients in place before the accreditation submission are not exempt from this requirement.

If you are in the process of securing amendments with this information, do not schedule your audit until you have **up to date agreements from all your clients.**

3.1 Truth in Advertising

Organization must have a mechanism to detail to clients what **information is being provided for each search type, including the three specific attributes in the clause – type of source, scope of record(s) searched and search methodology.**



This does not need to be a signed document from the customer, but this disclosure must be made, or reports should indicate how the client may obtain such information.

It is helpful for this information to be part of the agreement or provided during the implementation / onboarding process.

4.1 Public Record Researcher / Third Party Service Provider (Vendor/Agent) Agreement

As with 2.7, ensure that the agreements with **all vendors contain the required language** before your audit is scheduled. The auditor will be randomly selecting agreements to measure conformity so all agreements must be compliant.

4.2 Vetting Requirement

Understanding you may have vendors that were in place prior to the vetting requirements being set, it is still important to **show the vetting criteria of all new researchers / vendors**. This may be done with a vetting form or checklist that contains the suggested criteria. You do not have to use a checklist, but this process is an effective way to demonstrate that the vetting criteria is consistent and has been used for a particular vendor.

4.4 Errors & Omissions Coverage (E&O)

If you require that researchers / vendors maintain this coverage, you must be able to demonstrate some system/documentation to **ensure that this coverage remains in effect beyond the date of the initial vetting process for a new vendor**. It is wise to have an annual process in place to request Certificates of Insurance from all vendors, so they are readily available throughout the duration of the audit process and subsequent accreditation period. This is not an activity that is completed once every five years for accreditation.

4.5 Information Security

All organizations should have some signed and official documentation in their agreements with public record researchers / vendors specifying all the **requirements and methods used to secure and protect subject information** when such information is being transmitted and returned by public record researchers / vendors. It is **not sufficient to say that our public record researchers are primarily using our proprietary or "off the shelf" information system**. There must be a written agreement with them to protect this information.

4.6 Auditing Procedures

Organizations may wish to spend more time auditing specific researchers / vendors that do more work compared to others **audited within some specified period**



however audit procedures should cover all researchers / vendors used. Do not schedule your audit until you have conducted **at least one audit of each** of your current researchers / vendors. Pay close attention to the five criteria covered by the audit procedures in the Standard. It is also required to **maintain a summary of the audit results**. The audit is not the same as the cases involved in 2.13 Consumer / Subject Disputes, although these may be included in audits.

5.1 Verification Accuracy

Most applicants have good training resources and orientation practices to ensure accuracy in verifications work at the beginning of employment. Please provide information in your audit materials **describing what practices / policies / procedures are used to ensure ongoing verification accuracy after the initial orientation / training** of new verification staff.

6.5 Client Authentication

Before any records or reports are released to a client, they should be **authenticated to ensure they are a legitimate business with a need for the information**. Under the US Standard, this will define a permissible purpose for the information. There are specific authentication methods stipulated in the clause that must be included and **a written summary of the authentication must be maintained** by the organization. The auditor may request proof of authentication during the virtual audit from a sample of clients.

5.8 Outsourced Verification Services

Some organizations have relied on their vendor agreements to document compliance with the requirements of this section. This may or may not be sufficient since many of these agreements were signed prior to the development of the accreditation standards.

The safest method of ensuring compliance is to **add your own addendum or develop your own agreement** including all the required expectations and contract language to demonstrate compliance during your audit. You can expect that your auditor will review these agreements.

6.1 Background Checks for Organization Personnel Charged with Enforcement of Policy

Be prepared to provide evidence of criminal background checks for all **owners, officers and principals** of your organization that are involved in the business. This does not need to include parent company individuals if they are not directly involved in the enforcement of policy.

6.2 Background Checks for Organization Workers



Organizations must be able to demonstrate that background checks were **completed upon hire, and at least every two years thereafter**, as permissible, for all organization workers. This included part-time, full-time, contracted, and other work arrangements. A random check will be done for samples of current organization workers.

6.10 Professionalism and Proficiency Training / 6.11 Worker Confidentiality, Legal and Compliance Training

Many organizations have conducted initial and follow-up training regarding confidentiality, security, and legal compliance, but some applicants do not have particularly good **records documenting the dates and individuals participating in this training**. Attendance logs are helpful in demonstrating participation in this required training or alternatively, having a completed test for knowledge or signed agreement with the organization worker may also be useful. Note, these clauses require both training at hire and then again throughout the engagement of the organization worker.